

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Petitioner,

- v -

PARAMOUNT GLOBAL,

Respondent.

No. 24 Misc. 207 ()

ORDER TO SHOW CAUSE

NOTICE: **THIS IS A COURT ORDER WHICH REQUIRES YOU TO APPEAR IN PERSON IN ROOM _____, UNITED STATES COURTHOUSE, _____, NEW YORK, NEW YORK 10007, AT ____:00 A.M./P.M., ON _____, 202__.**

Upon the petition (the “Petition”) of the United States of America (the “Government” or the “United States”), by its attorney, Damian Williams, United States Attorney for the Southern District of New York, together with the Declaration of Revenue Officer Susan Locklin (the “Declaration”) of the Internal Revenue Service (“IRS”), it is hereby

ORDERED, that respondent Paramount Global (“Respondent”), appear before the United States District Court for the Southern District of New York, United States Courthouse, _____, New York, New York 10007, on _____, 202__, at ____:00 A.M./P.M., to show cause why it should not be compelled to testify and produce the books, records, papers, and other data demanded in the IRS summons served upon Respondent on November 2, 2023, and annexed to the Declaration as Exhibit 1; and it is further

ORDERED, that a copy of this Order, the Petition, the Declaration together with the annexed exhibits, and the Government’s Memorandum of Law be served upon Respondent by an agent, officer, or other person designated by the IRS; the United States Marshal; or, in the alternative, by any authorized Government official or any qualified person retained by the

Government to effect service of process, in accordance with Federal Rule of Civil Procedure 4 or state law for service of a summons and complaint, on or before _____, 202___; and it is further

ORDERED, that within fourteen (14) days after service upon Respondent of a copy of this Order, together with the Petition, the Declaration and the exhibits annexed thereto, and the Government's Memorandum of Law, Respondent, as well as any and all intervening parties, shall serve and file a written response, if any, to the Petition, supported by appropriate affidavit(s), as well as any motions it desires to make, with the Clerk of the Court, and serve copies upon counsel for the United States. The United States may file a reply memorandum to any opposition at least five (5) days prior to the date set for the hearing. All motions and issues raised by Respondent will be considered on the return date of this Order. Only those issues raised by motion or brought into controversy by the response hereto, if any, including any required supporting affidavits, will be considered at the return date of this Order, and any uncontested allegations in the Petition will be considered admitted; and it is further

ORDERED, that Respondent may notify the Court in writing, by filing with the Clerk and service upon counsel for the United States at the address on the Petition, at least fourteen (14) days prior to the date set for the hearing, that Respondent has no objection to enforcement of the summons. Respondent's appearance at the hearing will then be excused.

Dated: New York, New York

_____, 2024

HON.
UNITED STATES DISTRICT JUDGE